

April 30, 2021

*Via ECF and courtesy copy via email:
(ALCarterNYSDChambers @nysd.uscourts.gov)*

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

MEMO ENDORSED

Re: 1:19-cv-02978-ALC and 1:20-cv-01791-ALC
Plaintiffs' Request for Adjournment and Stay or Pre-Motion Conference

Dear Judge Carter:

Our office, as counsel for Plaintiffs Hoechstetter, *et al.* in the above-referenced matter and in accordance with Your Honor's Individual Practices, writes to advise the Court of recent developments between the parties.

On July 30, 2020, the undersigned counsel for Plaintiffs together with counsel for Defendants Columbia University, *et al.* and New York Presbyterian Hospital executed an "Agreement" memorializing the parties' belief that "... it is in their mutual interest to pursue settlement of the Claims at this time" and "that the parties agree to proceed in good faith" Pursuant to the Agreement, and prior to the commencement of settlement discussions between the parties, Plaintiffs served upon Defendants Columbia University, *et al.* and New York Presbyterian Hospital Plaintiff questionnaires. As directed by the Court, on October 9, 2020 the parties submitted a joint letter update advising the Court of the status of negotiations and requesting a continued stay while the parties continued to negotiate. The Court directed a further status update on February 26, 2021 (Docket 80). At that time, the parties requested and the Court granted an extension of the stay through April 30, 2021 and directed a status update at that time.

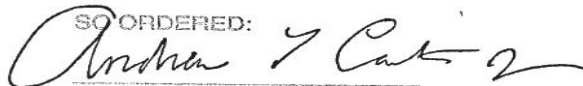
The parties wish to advise Your Honor that the parties have substantial agreement on a settlement term sheet and negotiations toward a Master Settlement Agreement continue. The parties mutual desire to work together toward achieving a fair resolution remains strong. As such, the parties respectfully ask for a forty-five day continuance of the previously imposed stay in both actions by which time the parties expect to have a Master Settlement Agreement in place.

Thank you for your attention to this matter and consideration of the foregoing.

Very truly yours,



Adam P. Slater, Esq.
Counsel for Plaintiffs
Slater Slater Schulman LLP


SO ORDERED:
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

May 3, 2021

The Parties shall file a status letter by June 17, 2021.

cc: **All Parties Via ECF**
Magistrate Judge Katharine H. Parker Via Email:
Parker_NYSDChambers@nysd.uscourts.gov